## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SHAWN HARRINGTON, on behalf of himself and all others similarly situated,	) ) )
Plaintiff,	)
v.	) Civil Action No. 1:19-cv-11180-RGS
WELLS FARGO BANK N.A.,	)
Defendant.	)
Defendant.	<u></u>

## MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiff Shawn Harrington ("Plaintiff"), by and through undersigned counsel, hereby moves for entry of an Order granting final approval of the Parties' Class Action Settlement Agreement.

In support, Plaintiff submits the accompanying Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and the Declarations of Jennifer M. Keough, Chief Executive Officer of JND Legal Administration LLC ("JND") and Sergei Lemberg.

Paragraphs 5 and 6 of Ms. Keough's Declaration detail compliance with the notice requirements of the Class Action Fairness Act, 28 U.S.C. § 1715.

Plaintiff respectfully requests that the Court approve the settlement as fair, reasonable and adequate and enter the Final Approval Order in the form attached hereto as <u>Exhibit A</u>.

Dated: December 3, 2020 Respectfully submitted,

By: /s/ Sergei Lemberg

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2020, I served a true and accurate copy of the foregoing to counsel of record through the Court's CM/ECF system which sent notice of such filing to all counsel of record.

/s/ Sergei Lemberg
Sergei Lemberg